

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

**CREEDON CONTROLS, INC., a
Delaware corporation,**

Plaintiff,

v.

Civil Action No. 05-CV-300

**BANC ONE BUILDING
CORPORATION, an Illinois
corporation; and FOREST ELECTRIC
CORPORATION, a New York
corporation,**

Defendants.

NOTICE OF RECORDS DEPOSITION

PLEASE TAKE NOTICE that the deposition of International Brotherhood of Electrical Workers, Local Union 313 will take place on Friday, December 9, 2005 at 11:00 a.m. in the offices of McCarter & English, 919 North Market Street, Suite 1800, P.O. Box 111, Wilmington, Delaware. Deponent is to bring any and all documents, files, reports, agreements, electronic files, correspondence, e-mail and contracts relating to d the construction project known as the Bank One CDC-II Project Wilmington, including but not limited to: (a) All reports submitted by Creedon Controls, Inc. to the Union; (2) All log books maintained by all foremen, general foremen, union members and/or others relating to the CDC-II Project; (3) All documents reflecting the hours spent by union members on the CDC-II Project in the employ of Creedon Controls, Inc.; and (4) All records reflecting benefits paid to the union by Creedon Controls, Inc. relating to the CDC-II Project. **PERSONAL APPEARANCE IS WAIVED IF RESPONSIVE DOCUMENTS ARE RECEIVED ON OR BEFORE DECEMBER 5, 2005.**

McCARTER & ENGLISH, LLP

/s/ Paul A. Bradley

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Dated: November 23, 2005